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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

BCB CHEYENNE LLC d/b/a BISON
 BLOCKCHAIN, a Wyoming limited liability
 Company,
)
)
)
)
 Plaintiff,
)
 v.)
)
)
 MINEONE WYOMING DATA CENTER,
)
 LLC, a Delaware limited liability company;
)
 MINEONE PARTNERS LLC, a Delaware
)
 limited liability company; TERRA CRYPTO
)
 INC., a Delaware corporation; BIT ORIGIN,
)
 LTD, a Cayman Island Company;
)
 SONICHASH LLC, a Delaware limited
)
 liability company; BITMAIN TECHNOLOGIES
)
 HOLDING COMPANY, a Cayman Island
)
 Company; BITMAIN TECHNOLOGIES
)
 GEORGIA LIMITED, a Georgia corporation;
)
 and JOHN DOES 1-18, related persons and
)
 companies who control or direct some or all
)
 of the named Defendants,
)
)
 Defendants.)

Civil No. 23-CV-79

**PLAINTIFF BCB CHEYENNE LLC d/b/a BISON BLOCKCHAIN’S
 FED. R. CIV. P 26(a)(2) EXPERT WITNESS DISCLOSURES**

COMES NOW Plaintiff BCB Cheyenne LLC d/b/a Bison Blockchain (“BCB”), through its counsel Patrick Murphy and Scott Murray of WILLIAMS, PORTER, DAY & NEVILLE, P.C., and pursuant to Fed. R. Civ. P. 26(a)(2)(B) and U.S.D.C.L.R. 26.l(g)(4), hereby designates the following expert

witness who may be called to testify in the trial of this matter. The testimony of any expert designated herein may be offered live or by trial deposition.

Discovery in this case is ongoing. The Defendants have not yet designated experts and no experts have been deposed. BCB reserves the right to amend or supplement this expert witness disclosure as additional information is discovered and, in particular, after the Defendants have produced requested documents, answered requested interrogatories, and served their own expert witness designation(s). BCB also reserves the right to call any expert whose necessity becomes known based upon another party's disclosure or deposition or for rebuttal, and the right to withdraw the designation of any expert and to re-designate that expert as a consulting expert who cannot be called by opposing counsel.

By providing this designation, BCB does not waive, and expressly reserves its right to assert, any and all objections it may have to the admissibility of the expert testimony offered by Defendants, and to seek limitation or exclusion of Defendants' experts' opinions. Additionally, identification of an expert is not a guarantee that BCB will call said expert at trial.

RETAINED EXPERT

Patrick Gahan
ALDER Capital Partners
Marietta, Georgia
Website: <https://www.aldercp.com>
Phone: (470) 207-1558

Patrick Gahan is an experienced entrepreneur with a strong understanding of the financial and operational cost efficiencies involved in the organization and execution of various types of businesses, including experience in the cryptocurrency sector. Mr. Gahan will opine on all the matters in his attached Expert Report. Mr. Gahan's opinions are set forth in his detailed Expert Report attached as "Exhibit 1."

Also included as exhibits to this Expert Witness Disclosure statement are Michael Murphy's Campstool Affidavit ("Exhibit 2") and Emory Patterson's Power Expansion Affidavit (Exhibit 3"). Mr. Gahan has read and relies on both of these Affidavits for some of the opinions in Mr. Gahan's Expert Report.

Mr. Gahan's curriculum vitae is included as an exhibit to his attached Expert Report.

Mr. Gahan will charge \$1,500/hour for all his professional work on this case, which includes his work writing, editing and finalizing his Expert Report, potentially his work reviewing and critiquing the Defendants' expert report(s), and testifying at the trial in Cheyenne, Wyoming. If the Defendants later request to take Mr. Gahan's deposition, Defendants' counsel are responsible for paying Mr. Gahan's \$1,500/hour fees for his deposition time.

Mr. Gahan has not testified as an expert at a deposition or trial in the past four years.

DATED this 20th day of March 2024.

BCB CHEYENNE LLC d/b/a
BISON BLOCKCHAIN,

Plaintiff

By: /s/ Patrick J. Murphy
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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing document was delivered to the Court via the CM/ECF System and served upon counsel via CM/ECF electronic transmission this 20th day of March 2024.

Sean M. Larson, WSB No. 7-5112 Kari Hartman, WSB No. 8-6507 HATHAWAY & KUNZ, LLP P.O. Box 1208 Cheyenne, WY 82001 slarson@hkwyolaw.com khartman@hkwyolaw.com	<input type="checkbox"/> U. S. Mail (prepaid) <input checked="" type="checkbox"/> CM/ECF Electronic Transmission <input type="checkbox"/> Overnight Delivery <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Electronic Mail
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